

CPNI Compliance Statement and Operating Procedures of Netitek LLC.

Kevin Charbonneau signs this Certificate of Compliance and inquiry response in accordance with § 222 of the Telecommunications Act of 1996, as amended, 47 C.F.R. § 64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with 47 CRF 64.2001-.2009. The purpose of this statement is to summarize Company's policies and procedures designed to safeguard CPNI.

On behalf of the Company, I certify as follows:

Company uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. Company does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

Company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Company has established procedures to verify an incoming caller's identity. Company trains its personnel in both the use of CPNI, and protection of its confidentiality. Company also limits the number of employees that have access to customer information and call data.

The Company has chosen to prohibit the use or disclosure of CPNI for marketing purposes. If CPNI is to be used for Sales or Marketing in the future, the required notice and opt-out approval process will be conducted as required, and safeguards will be implemented in accordance with 47 C.F.R. § 64.2009.

¹ 47 C.F.R. S: 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."



The carrier has established a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintains records of carrier compliance for a

minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

The Company will provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1)The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2)Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

Company will track customer complaints regarding CPNI, notify its customers in accordance with the FCC's rules and will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI. Company annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.

Kevin Charbonneau
Chief Operating Officer
Netitek LLC